



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400  
NEW YORK, NY 10281-1022

June 15, 2023

**By ECF**

Hon. Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *SEC v. Charlie Javice et al.*, 23 Civ. 2795 (LJL)

Dear Judge Liman:

Plaintiff Securities and Exchange Commission (the “Commission”) respectfully submits this letter in further response to two questions that the Court raised at the June 15, 2023 conference regarding the motion by the United States Attorney’s Office (“USAO”) to stay discovery in this matter.

First, the Commission confirms that it will not object to defendant Charlie Javice’s use, in the civil litigation, of documents obtained in the parallel criminal case (“Criminal Case Materials”) on the basis that they were obtained in the criminal case, provided that Javice obtains relief from any applicable protective order and that Javice complies with any civil discovery obligations concerning the Criminal Case Materials.

Second, the Commission will produce to the USAO, pursuant to its access request, any materials obtained in the Commission’s continuing investigation of uncharged parties promptly following the receipt of such documents by the Commission.

Respectfully submitted,

/s/ Daniel Loss

Daniel Loss  
Senior Trial Counsel

cc: All counsel of record (by ECF)